

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

(1) GREAT LAKES INSURANCE SE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-22-702-JD
	)	
(2) FREDY VALLE d/b/a VALLE	)	
TRUCKING;	)	
(3) SILVER STAR CONSTRUCTION	)	
COMPANY, INC.;	)	
(4) TYLON MACKEY;	)	
(5) ISRAEL JUAREZ;	)	
(6) ORD TRUCKING, INC.;	)	
(7) ZURICH AMERICAN INS. CO.	)	
	)	
Defendants.	)	
	)	
and	)	
	)	
(8) ZURICH AMERICAN INS. CO.,	)	
	)	
Third-Party Plaintiff,	)	
v.	)	
	)	
(9) BERKSHIRE HATHAWAY	)	
HOMESTATE INS. CO., and	)	
(10) PROGRESSIVE NORTHERN INS. CO.,	)	
	)	
Third-Party Defendants.	)	

**JOINT STATUS REPORT**

The Parties respectfully submit this Joint Status Report as required under the Scheduling Order (Dkt. # 56) in this case. The categories and information detailed herein specifically address the topics listed by the Court in its Order. Dkt. # 56, p.3.

1. **OVERALL STATUS OF CASE**

The parties continue to investigate their respective claims in the case. Plaintiff intends to dismiss Israel Juarez and ORD Trucking, Inc. from the case to narrow the issues and parties.

2. **UPDATES REGARDING DISCOVERY**

The parties are in the process of preparing and issuing discovery. The issues presented in this case involve the party's rights and responsibilities related to insurance policies. The parties produced their respective policies in initial disclosures, and believe that most, if not all, of the issues in this case can be resolved through interpretation of the policies. However, Plaintiff anticipates issuing discovery so that it may be completed before the close of discovery, on November 7, 2023. Defendant/Third-Party Zurich American Insurance Company has issued discovery to Plaintiff Great Lakes and Third-Party Defendant Progressive Northern Insurance Company.

3. **ANTICIPATED MOTIONS**

- a. Plaintiff: Plaintiff, Great Lakes anticipates filing a Motion for Summary Judgment before the dispositive motion cut-off date of November 7, 2023.
- b. Defendant/Third-Party Plaintiff Zurich American Insurance Company: Defendant/Third-Party Plaintiff Zurich American Insurance Company anticipates filing a Motion for Summary Judgment on or before November 7, 2023 in accordance with the Court's Scheduling Order.

- c. Defendant Progressive Northern Ins. Co.: Third-Party Defendant Progressive Northern Insurance Company anticipates filing a Motion for Summary Judgment before the close of discovery.
- d. Defendant Silver Star Construction Company, Inc: Defendant Silver Star Construction Company, Inc., anticipates filing a Motion for Summary Judgment before the close of discovery.
- e. Defendant Tylon Mackey: Defendant Mackey may file a motion for summary judgment if the facts obtained in discovery will support it.

DOERNER, SAUNDERS, DANIEL & ANDERSON,  
L.L.P.

By: s/Emily Allan

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***Attorneys for Plaintiff Great Lakes Insurance  
SE***

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that, on August 7, 2023, I electronically transmitted the above document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System, including all counsel of record.

*s/Emily Allan*